Mr. Mike McIntire
Frito-Lay, Inc.
2611 W County Road 0 NS
Frankfort, IN 46041-8750

Dear Mr. McIntire:

Re: Exempt Construction and Operation Status,
023-11942-00020

The application from Frito-Lay, Inc., received on February 28, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the three (3) new product coolers, to be located at 2611 W County Road 0 NS, Frankfort, Indiana, is classified as exempt from air pollution permit requirements:

(a) One (1) TC Line #4 ambient air product cooler, identified as CP-5D, with a maximum cooling capacity of XX* pounds of snack food per hour, and exhausting at one (1) stack, identified as SCP-5D.

(b) One (1) TC Line #5 ambient air product cooler, identified as CP-6D, with a maximum cooling capacity of XX* pounds of snack food per hour, and exhausting at one (1) stack, identified as SCP-6D.

(c) One (1) TC Line #6 ambient air product cooler, identified as CP-7E, with a maximum cooling capacity of YY* pounds of snack food per hour, and exhausting at one (1) stack, identified as SCP-7E.

Note: * The process weight for these product coolers have been claimed to be confidential by the Permittee.

The following conditions shall be applicable:

(1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuos opacity monitor in a six (6) hour period.

(2) Pursuant to 326 IAC 6-3-2 (Process Operations)

The TC Line#4, 5 and 6 coolers shall not exceed the allowable particulate matter (PM) emission rate accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour.

The process weight from the coolers were not used here because the Permittee claims them to be confidential information.

This existing source has submitted their Part 70 application T 023-7721-00020 on June 12, 1997. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Spahi

cc: File - Clinton County
Clinton County Health Department
Air Compliance - Eric Courtright
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Mendy Jones

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for an ***Exemption***

Source Background and Description

Source Name: ***Frito-Lay, Inc.***
Source Location: ***2611 W County Road 0 NS, Frankfort, Indiana 46041-8750***
County: ***Clinton***
SIC Code: ***2096***
Operation Permit No.: **023-11942-00020**
Permit Reviewer: ***Spahi***

The Office of Air Management (OAM) has reviewed an application from Frito-Lay, Inc. relating to the construction and operation of three (3) new product coolers.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) TC Line #4 ambient air product cooler, identified as CP-5D, with a maximum cooling capacity of XX* pounds of snack food per hour, and exhausting at one (1) stack, identified as SCP-5D.

(b) One (1) TC Line #5 ambient air product cooler, identified as CP-6D, with a maximum cooling capacity of XX* pounds of snack food per hour, and exhausting at one (1) stack, identified as SCP-6D.

(c) One (1) TC Line #6 ambient air product cooler, identified as CP-7E, with a maximum cooling capacity of YY* pounds of snack food per hour, and exhausting at one (1) stack, identified as SCP-7E.

Note: * The process weight for these product coolers have been claimed to be confidential by the Permittee, so these process weights are not listed in the TSD or in the Exemption letter.

Stack Summary

Stack ID	Operation	Height * (feet)	Diameter* (feet)	Flow Rate* (acfm)	Temperature* (^{0}F)
SCP-5D	TC Line #4	36.75	2' x 2'	5000	150
SCP-6D	TC Line #5	36.75	2' x 2'	5000	150
SCP-7E	TC Line #6	36.75	2' x 2'	5000	150

* These parameters are estimated.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on February 28, 2000.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. Since these calculations are confidential they are not attached to this document.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	2.56
PM-10	2.56
SO_2	0.0
VOC	0.0
CO	0.0
NO_x	0.0

(a) The potential to emit (as defined in 326 IAC 2-1.1-3(d)(1)) of PM and PM-10 is less than five (5) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.

County Attainment Status

The source is located in Clinton County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Clinton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Clinton County has been classified as attainment or unclassifiable for PM and PM-10. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	> 100
PM10	> 100
SO_2	> 400
VOC	> 40
CO	> 100
NO_x	> 500

(a) This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at a rate of 250 tons per year.

(b) These emissions were based on past permits issued to the source.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO_x (ton/yr)
Proposed Modification	2.56	2.56	0.0	0.0	0.0	0.0
Net Emissions	2.56	2.56	0.0	0.0	0.0	0.0
PSD or Offset Significant Level	25	15	40	40	100	40

(a) This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 T 023-7721-00020 application on January 12, 1997. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM, PM-10,SO_2, NO_X and CO. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The TC Line#4, 5 and 6 coolers are supposed to comply with the allowable emission limit calculated from the equation above. The potential to emit of particulate matter (PM) from the coolers is less than the allowable emission limit, so these coolers meet this rule. The process

weight from the coolers were not used here because the Permittee claims them to be confidential information.

Conclusion

The construction and operation of this new snack food processing line shall be subject to the conditions of the attached proposed Exemption 023-11942-00020